

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EDUARDO OLVERA, DELFINO OLVERA,
FERNANDO PERALTA, AND MODESTO PERALTA,
individually and on behalf of others similarly situated,

Plaintiffs,

No. 14-cv-1372 (PAE)

-against-

**RULE 26(a)(1) INITIAL
DISCLOSURE**

BAREBURGER GROUP LLC, BAREBURGER INC.,
EAST 87 BURGERS LLC, (d/b/a 1681 FIRST AVENUE
BAREBURGER), EAST SIDE BURGERS LLC (d/b/a
1370 FIRST AVENUE BAREBURGER), BAREBURGER
EAST SIDE LLC (d/b/a BAREBURGER), EURIPIDES
PELEKANOS, GEORGIOS RODAS, JOSEPH BUSUTTIL,
PANTELIS TZANIDAKIS, PETROS TZANIDAKIS,
GEORGIOS TZANIDAKIS, JOHN KAPSALIS,

Defendants.

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Defendants, Bareburger, Inc., Bareburger Group, LLC, Euripides Pelekanos and Georgios Rodas, by their attorneys, Acquista & Associates, PC, as and for their initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1), respectfully submit the following:

**I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION
THAT MAY BE USED TO SUPPORT DEFENDANTS' CLAIMS:**

Defendants' initial disclosure is made without the benefit of any discovery. Defendants reserve the right to amend their disclosures to add additional witnesses.

A. Individuals Associated With Plaintiff

1. Eduardo Olvera
Address Unknown
Information includes: full knowledge of dispute

2. Delfino Olvera
Address Unknown

Information includes: full knowledge of dispute

3. Fernando Peralta

Address Unknown

Information includes: full knowledge of dispute

4. Modesto Peralta

Address Unknown

Information includes: full knowledge of dispute

B. Individuals and Entities Affiliated with Defendants

1. Georgios Rodas

31-29 Vernon Boulevard, Long Island City, New York, 11106

Information includes: full knowledge of dispute

2. Euripides Pelekanos

31-29 Vernon Boulevard, Long Island City, New York, 11106

Information includes: full knowledge of dispute

3. Joseph Busuttil

12-52 Clintonville Street, Suite 200, Whitestone, New York, 11357

Information includes: full knowledge of dispute

4. Pantelis Tzanidakis

12-52 Clintonville Street, Suite 200, Whitestone, New York, 11357

Information includes: full knowledge of dispute

5. Petros Tzanidakis

12-52 Clintonville Street, Suite 200, Whitestone, New York, 11357

Information includes: full knowledge of dispute

6. Georgios Tzanidakis

12-52 Clintonville Street, Suite 200, Whitestone, New York, 11357

Information includes: full knowledge of dispute

7. John Kapsalis

12-52 Clintonville Street, Suite 200, Whitestone, New York, 11357

Information includes: full knowledge of dispute

C. Third-Party Witnesses

1. None.

II. CATEGORIES AND LOCATION OF DOCUMENTS:

1. Documents related to formation of Bareburger, Inc. and Bareburger Group, LLC.
2. Documents related to the franchise of East 87 Burgers LLC (d/b/a 1681 First Avenue Bareburger), East Side Burgers LLC (d/b/a 1370 First Avenue Bareburger), and Bareburger East Side LLC (d/b/a Bareburger), including, but not limited to franchise agreements.

All of the aforesaid documents are located at the following address:

31-29 Vernon Boulevard, Long Island City, New York, 11106

III. COMPUTATION OF DAMAGES

Defendants have not interposed any counter-claims or cross-claims for damages.

IV. INSURANCE

Defendants, at this time, are not aware of any insurance agreement under which any persons carrying on an insurance business may be liable to satisfy all or part of a judgment which may be entered in favor of Plaintiff or to indemnify or reimburse Defendants for payments to satisfy the judgment.

Dated: Queens, New York
August 11, 2013

Acquista & Associates, P.C.

/s/ Salvatore J. Acquista
By: Salvatore J. Acquista, Esq. (SA-1331)
32-75 Steinway St., Suite 211
Astoria, NY 11103
Telephone: (718) 274-1010
Facsimile: (718) 274-1077
*Attorneys for Franchisor Defendants
Bareburger, Inc., Bareburger Group,
LLC, Euripides Pelekanos and
Georgios Rodas*

CERTIFICATE OF SERVICE

I, Salvatore J. Acquista, hereby certify that on August 11, 2014, a true and correct copy of foregoing RULE 26(a)(1) INITIAL DISCLOSURE was served electronically via the Court's ECF System upon the below attorneys and that it is available for viewing and downloading from the ECF System.

Steven D. Hans & Associates, P.C.
Attorneys for East 87 Burgers LLC, East Side Burgers LLC
Joseph Busuttil, Pantelis Tzanidakis, Petros Tzanidakis,
Georgios Tzanidakis and John Kapsalis
41-18 Court Square, Suite 403
Long Island City, New York 11101
Attn: Stephen D. Hans, Esq.

Michael Faillance & Associates, P.C.
Attorney for Plaintiffs
60 East 42nd Street, Suite 2020
New York, New York 10165
Attn: Michael Faillance, Esq.

s/ Salvatore J. Acquista
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Georgios Rodas*